

Case 1:07-cv-09443-PAC
Sea Consortium Pte Ltd
11 Duxton Hill
Singapore 089595

Document 9-6

Filed 04/04/2008

3 Church Street
#19-03 Page 1 of 25

Singapore 049483

Tel +65 6534 0195
Fax +65 6534 5864

Attention: Messrs Tim Hartnoll/Tristan Howitt

holmans@hfw.com.sg
www.hfw.com

TAX INVOICE
GST REG NO: M9-0005261-C

Date: 31 July 2007

Our Ref: SSD/10656/22/iy

Bill No.: S08118

JAAMI
Period Covered : 28 June to 30 July 2007

To our professional charges for all advice and assistance given in this matter as set out in the attached breakdown of time spent.

Our fees :	S\$ 3,472.50
+5% GST	S\$ 176.63
Our fees :	S\$ 52,860.00
+7% GST	S\$ 3,700.20
Disbursements:	
HFW London bill 00805620, attached	S\$ 8,990.24
HFW Paris bill 2007 1 0797, attached	S\$ 18,762.23
DHL courier	S\$ 163.75
+5% GST	S\$ 1,395.81
Courier, telephone, fax and photocopying charges, and other incidentals	S\$ 638.97
+7% GST	S\$ 44.73
Total	<u>S\$ 90,202.06</u>


HOLMAN FENWICK & WILLAN
HFWSP94771-1

Direct remittance may be made to The Hong Kong and Shanghai Banking Co. Ltd.
Collyer Quay Branch, 21 Collyer Quay, Singapore 049320, quoting our bill no.
GB Pounds A/C 260-258843-181 Swift Code: HSBCSGSG
Singapore Dollars A/C 141-364083-002 Swift Code: HSBCSGSG
US Dollars A/C 260-258843-180 Swift Code: HSBCSGSG
If paying by cheque, please return the attached copy with your payment.
Please pay net of all bank charges.

Breakdown of Time on a Daily Basis

HFW Bill No S08118

Club Ref: NA
 Our File No: 00010656 / 00000022
 Client: Sea Consortium Pte Ltd
 Matter: SX Jaami / X-Press Resolve / X-Press Manaslu

<u>Transaction Date</u>	<u>FE Name</u>		<u>Hours</u>
28/06/2007	S S Davidson	Email to clients. Email from Freehills.	0.3
28/06/2007	D Janssen	Email from Freehills with advice on procedure and revised declaration for enforcement, email response; reviewing email report to SeaCon and RaetsAsia on schedule of sums due served on WFW; reviewing and amending draft 4th affidavit for Singapore enforcement proceedings, receiving and reviewing exhibits, email response to Rajah & Tann with revised affidavit; reviewing and amending declaration and damages statement and calculation for US enforcement proceedings, email reply and instructions to Freehills with scanned copy of signed declaration and revised exhibit; attending at Rajah & Tann's offices for swearing affidavit and briefing Kendall Tan on proceedings in London, Paris and New York; email instructions and courier letter to Orr Dignam to arrange personal service.	3.8
29/06/2007	D Janssen	Email from Michael Unger of Freehill Hogan & Mahar, collating court papers as filed in US enforcement proceedings, reviewing US court's acknowledgment of Watson Farley & William's withdrawal of HRC's challenge to US attachments, email response and query to Freehills re dismissal of HRC's case against attachments, email report to SeaCon and RaetsAsia; Email from Rajah & Tann with scanned copies of Dirk Janssen's 4th affidavit in the enforcement proceedings and notes of evidence given at the hearing, email report to SeaCon and RaetsAsia; Email confirmation of instructions for French attachments from Yong Lim Kong and response.	1.6
02/07/2007	D Janssen	Email from Michael Unger of Freehill Hogan & Mahar advising on enforcement procedure and estimating recoverable costs, email report to Sea Consortium and RaetsAsia; discussing and considering time-table and preparations for Singapore enforcement procedure with Simon Davidson, telcon with Kendall Tan of Rajah & Tann to check position and state of preparation for hearing and attachments.	1.0
03/07/2007	D Janssen	Discussing and considering Singapore enforcement proceedings with Simon Davidson, email instructions to Rajah & Tann, revising schedule of sums due and payable by HRC to SeaCon, liaising with Kendall Tan of Rajah & Tann in telcons and email exchanges, reviewing and amending draft message to Gurbani & Co, discussing matter with Simon Davidson, perusing fax message as sent.	2.0
03/07/2007	S S Davidson	Email to Rajah & Tann in connection with the Singapore proceedings.	0.3

04/07/2007	D Janssen	Email from Michael Unger of Freehill, Hogan & Mahar; Email from Sarah Johnson of HFW London with approved judgment of English High Court, forwarding judgment to Rajah & Tann and Freehill, Hogan & Mahar for Singapore and US enforcement proceedings; Discussing and considering matters with Simon Davidson; Receiving and reviewing draft affidavit from Rajah & Tann for enforcement proceedings, considering correspondence with Gurbani & Co, email response and instructions to Rajah & Tann; email to Yong Lim Kong of SeaCon requesting an up to date search of the Bangladesh ship registry and response from Jeffrey Lim; telcon with Kendall Tan re correspondence with Gurbani and filing of further affidavit as well as service in Bangladesh, telcon with Orr Dignam and email report to Rajah & Tann.	2.0
05/07/2007	D Janssen	Email from Kendall Tan of Rajah & Tann re seeking order absolute for enforcement of second award, further email from Tara Davenport of Rajah & Tann with her further affidavit as filed; Email from Kendall Tan with draft judgment and affidavit for enforcement of second award, reviewing draft and email reply, commencing work on schedule of costs.	1.4
06/07/2007	D Janssen	Email from Tara Davenport of Rajah & Tann. Reviewing and amending revised draft affidavit for order absolute for enforcement of second award. Discussing and considering matter with Simon Davidson. Telcons with Tara Davenport. Preparing schedule of costs awarded in arbitration. Telcon with Kendall Tan of Rajah & Tann.	2.7
06/07/2007	S S Davidson	Reviewing draft affidavit.	0.2
07/07/2007	D Janssen	Discussing and considering developments with Simon Davidson. Briefing Nasreen Hafizullah of Orr Dignam in telephone conversations and seeking advice on injunction over HRC's assets.	0.5
09/07/2007	S S Davidson	Conference call with Rajah & Tann and discussion with Dirk Janssen. Call to Yong Lim Kong. Reviewing Gurbani application to come off record.	0.9
09/07/2007	D Janssen	Briefing Simon Davidson on discussions with Orr Dignam, email enquiries to Orr Dignam and Rajah & Tann, further discussing and considering matter with Simon Davidson; teleconference with Toh Kian Sing of Rajah & Tann, telcon with Yong Lim Kong of Sea Consortium re HRC fleet registry and schedule of calls at Singapore; Liaising with Tara Davenport of Rajah & Tann to prepare applications for garnishee orders and writs of seizure and sale; Preparing schedules of costs for first and second arbitration awards, writing to A Hossain & Associates and Watson Farley & Williams for costs to be agreed, Perusing email from Rajah & Tann with application and affidavit by Gurbani & Co for leave to cease to act for HRC, discussing and considering matter with Simon Davidson, email instructions to Rajah & Tann, email report and recommendations to SeaCon and RaetsAsia.	5.4
10/07/2007	S S Davidson	Emails from Orr, Dignam. Discussion with Dirk Janssen. Considering ship information. Confernce call to Orr, Dignam.	0.7

10/07/2007	D Janssen	<p>Perusing email from Orr Dignam confirming service, forwarding confirmation to Rajah & Tann and Lee, Ong & Kandiah; discussing and considering matter with Simon Davidson; liaising with Toh Kian Sing and Tara Davenport of Rajah & Tann in telcons and by email over preparation and documentation of garnishee and seizure papers; telcons with Yong Lim Kong of SeaCon; teleconference with Orr Dignam together with Simon Davidson, considering draft judgments for enforcement of first and second award in Singapore, email response and instructions to Rajah & Tann; receiving sealed judgment for second award, email report and recommendations to SeaCon, liaising with Yong Lim Kong, Jeffrey Lim and Tara Davenport to prepare enforcement steps; letters from Jeffrey Lim and HFW Paris re French proceedings, email report to Jeffrey Lim and enquiry to HFW Paris.</p>	4.0
11/07/2007	D Janssen	<p>Telcon with Tara Davenport of Rajah & Tann re Writs of Seizure and Sale, telcons with Jeffrey Lim of SeaCon to arrange funding; Email from Freehills re further attachment in New York and response, email from HFW Paris re challenges to attachments in Marseille and response, email report to Sea Consortium and RaetsAsia on US and French proceedings; Email from Rajah & Tann re funding of sheriff's charges and liaising with Jeffrey Lim of SeaCon; Further telcons with Tara Davenport re interest and costs calculations for filing of writs, preparing and forwarding revised calculations to Rajah & Tann, researching HRC fleet ownership and providing SeaWeb search results to Rajah & Tann, telcon with Kendall Tan of Rajah & Tann re hearing and enforcement steps, telcons with Yong Lim Kong and Jeffrey Lim re details for garnishee application and ship registry extracts, email from Jeffrey Lim with Bangladeshi ship registry, forwarding this to Rajah & Tann, liaising further with Tara Davenport and discussing matters with Simon Davidson; telcons with Yong Lim Kong and Kendall Tan over garnishee targets and papers, receiving, considering and forwarding report on hearing to SeaCon and RaetsAsia, receiving, reviewing and amending in telcon with Kendall Tan draft summons and affidavit for garnishee proceedings, email from and telcon with Yong Lim Kong re revised list of MLO garnishee targets and revised ETA of Banga Borat, telcon with Kendall Tan; email from HFW London with transcript of hearing and response.</p>	4.5
12/07/2007	D Janssen	<p>Email from Freehills and response, email from SeaCon, telcons with Tara Davenport of Rajah & Tann, finalising writs of seizure and sale, liaising over execution of affidavits in support of garnishee applications; email from A Hossain & Associates and response; email to Yong Lim Kong re updated ETA of Banga Borat and preparation of garnishee papers; email update of ETA from Yong Lim Kong and forwarding this to Rajah & Tann; attending at Rajah & Tann's offices, meeting with Tara Davenport for finalising and swearing affidavits in support of garnishee applications, meeting with Toh Kian Sing to discuss enforcement steps and strategy and liaison with sheriff; discussing and considering matters in telcon with Simon Davidson; email to Yong Lim Kong re guidance as to berthing for sheriff, response and forwarding information to Rajah & Tann; email enquiry on registration of ship mortgages to Orr Dignam, telcon with Yong Lim Kong.</p>	3.0

13/07/2007	D Janssen	Email correspondence with Orr Dignam on registration of ship mortgages in Bangladesh, forwarding initial advice to SeaCon/RaetsAsia and Rajah & Tann, email to Orr Dignam seeking clarification and further advice, emails from Yong Lim Kong and Jeffrey Lim on previous efforts to obtain mortgage information, email response to SeaCon, informing Rajah & Tann, seeking further clarification and advice from Orr Dignam on consent requirement for mortgage register, telcons with Yong Lim Kong and Tara Davenport re garnishee papers, emails from Jeffrey Lim, further liaising with Rajah & Tann and Sea Consortium over seizure of vessel and garnishing of MLO's local representatives; attending at Rajah & Tann's offices to swear affidavits in support of garnishee proceedings; further email correspondence and telcons with SeaCon and Rajah & Tann.	5.0
13/07/2007	D Janssen	Late night email correspondence and telephone conversations with Rajah & Tann over seizure of m.v. Banga Borat and further advice required on service in Bangladesh for supplementary affidavit required for garnishee proceedings, email instructions to advise to Orr Dignam.	0.5
14/07/2007	D Janssen	C/M Briefing Simon Davidson on seizure of Banga Borat and mortgage advice required from Orr Dignam; liaising with Tara Davenport of Rajah & Tann and reporting to Sea Consortium and RaetsAsia on vessel seizure.	0.6
17/07/2007	D Janssen	Receiving notice of and dealing with issue of arrest orders in Bangladesh against mv Da Li and mv Lady Fatima time chartered by Sea Consortium, email correspondence and telephone conversations with Sea Consortium and Orr Dignam, obtaining and considering ship registration certificates and forwarding these to Orr Dignam with instructions, obtaining Orr Dignam's advices over the telephone, discussing and considering matter in telcons with Simon Davidson and Tim Hartnoll; receiving and considering Banga Borat valuation, responding to Yong Lim Kong's email enquiry re further seizures and informing Rajah & Tann; liaising with Rajah & Tann over garnishee proceedings, obtaining further advice on Bangladesh law on service from Orr Dignam and instructing Rajah & Tann, reviewing draft and attending at Rajah & Tann's office to swear affidavit, further email correspondence and telcons with Tara Davenport of Rajah & Tann regarding assistant registrar's requirements for garnishee orders; considering email advice from Toh Kian Sing of Rajah & Tann on mortgage position and costs of Banga Borat seizure, receiving and reviewing Singapore court papers and sheriff's inventory of seized vessel; email correspondence with Orr Dignam and Sea Consortium over warrant of authority for Orr Dignam to be appointed by owners; receiving Bangladesh summons re arrest of mv Da Li from Capt Chowdhury, reviewing and forwarding this to Simon Davidson, advising Orr Dignam to liaise with Capt Chowdhury to obtain court papers and warrant of authority; reporting to and advising Sea Consortium and RaetsAsia on all issues throughout the day;	5.8

17/07/2007	D Janssen	E-mails from Sea Consortium Bangladesh, collating and reviewing arrest papers for mv Da Li and mv Lady Fatima; Liaising with Rajah & Tann over affidavits in support of garnishee applications, attending at Rajah & Tann's offices for swearing affidavits; Email from Jeffrey Lim of SeaCon re warrant of authority by owners for Orr Dignam; Email advice and recommendations on arrest papers to Sea Consortium and RaetsAsia, email to Orr Dignam seeking advice and time estimate on setting aside arrest and striking out action, telcon with Yong Lim Kong discussing arrest and recommendations; re-attending at Rajah & Tann's offices for swearing further affidavits required by assistant registrar for garnishee proceedings; Email report from Rajah & Tann on sheriff's procedure for seizure and sale of Banga Borat, forwarding this to SeaCon with request to arrange formal valuation in due course; Email correspondence with Jeffrey Lim of SeaCon and Orr Dignam to arrange to put bank guarantee in place; Email correspondence and telcons with Yong Lim Kong in respect of arrest proceedings and advising on dealing with requests of owners of mv Da Li; Email from SeaCon with time charterparty for Da Li, reviewing terms and forwarding copy to Orr Dignam; discussing and considering matter in telcon with Simon Davidson, email enquiry to Orr Dignam on taking matter up with chief justice;	5.7
17/07/2007	S S Davidson	Reading emails and call from Tim Hartnoll.	0.6
18/07/2007	S S Davidson	Reviewing emails and call to Dirk Janssen.	0.6
18/07/2007	D Janssen	Email from Simon Davidson with instructions from Tim Hartnoll; Email enquiry from Jeffrey Lim re possible injunction, email response with advice and recommendations to Sea Consortium; Email enquiry from Yong Lim Kong re bank guarantee, email reminder to Orr Dignam re bank guarantee wording and seeking advice on requirements, email advice in response to Sea Consortium; discussing and considering application to arbitrator and notice to opposition in telcon with Simon Davidson; drafting urgent application to arbitrator and notice to opponents; Email advice from Orr Dignam, long teleconference with Mr Hafizullah and his daughter Nasreen to clarify position, forwarding advice to Sea Consortium and RaetsClub with recommendations; Liaising with Rajah & Tann over courier service; Email from Yong Lim Kong with broker's valuation and comments by email in response; Liaising with Jeffrey Lim and Capt Chowdhury over appointment of declaring agent for owners to instruct Orr Dignam; Liaising with Yong Lim Kong over Lady Fatima; Perusing email from Rajah & Tann reporting on garnishee proceedings and advising SeaCon and RaetsAsia; Receiving bank guarantee wording from Orr Dignam and forwarding this to SeaCon; Receiving email and telephone call from Tara Davenport of Rajah & Tann regarding approach to sheriff by new Singapore solicitors acting for HRC, liaising with Rajah & Tann over response to sheriff and reporting to SeaCon and RaetsAsia; email urgent application to Mark Hamsher, serving copies by email on Hossain and Watson Farley, email report to clients and club.	6.5

19/07/2007

D Janssen

Emails from arbitrator Mark Hamsher, email response to arbitrator with further supporting documents and confirmation of representation, email application to Mr Hamsher for award of costs; Emails from Jeffrey Lim of Sea Consortium with charterparty for Lady Fatima and appointment letter for declaring agent by owners of Da Li, email responses to Jeffrey Lim, email instructions to Orr Dignam; email from Dr Zahir, email instructions and information to Dr Zahir in response; Email from Rajah & Tann with sheriff's correspondence with HRC's Singapore solicitors, email response to Rajah & Tann seeking outline advice on any challenge to seizure of Banga Borat, email report to Sea Consortium and RaetsAsia; Telcons from Orr Dignam and to Jeffrey Lim to arrange for owners of Lady Fatima to appoint agent to instruct Orr Dignam to set aside arrest order; email confirmation from Jeffrey Lim of request sent to owners via brokers, obtaining and forwarding owners' letter appointing agent to sign warrant of authority for Orr Dignam; email from Watson Farley & Williams, email response to arbitrator; telcon and email from Jeffrey Lim re Lady Fatima charterparty, forwarding this to Orr Dignam.

3.3

20/07/2007

D Janssen

Email from Orr Dignam further to late night telcon with revised appointment letters for owners' agents to instruct Orr Dignam and draft application to vacate arrests, email to Sea Consortium to obtain fresh letters for agents' appointments and review draft; Email from Rajah & Tann with advice on potential challenges by HRC against the seizure and sale of Banga Borat and response; Email from Mark Hamsher with directions for response by HRC Shipping to urgent application; Receiving from Jeffrey Lim and forwarding to Orr Dignam revised appointment letters and bareboat charter for Lady Fatima; Email from Dr Zahir and instructions in response; Email from Toh Kian Sing of Rajah & Tann with enquiry from sheriff as to HRC's intentions to complete repairs on Banga Borat, email enquiry from Yong Lim Kong on publicity issues, discussing and considering matters in telcon with Simon Davidson, email response to Toh Kian Sing; email report to Sea Consortium and RaetsAsia on developments in Singapore and London, liaising with Jeffrey Lim over appointment of Dr Zahir for SeaCon through Capt Chowdhury in Bangladesh; telcon with Yong Lim Kong; reviewing draft application to vacate arrests, email reply to Orr Dignam with amendments.

2.7

21/07/2007

D Janssen

Email from Orr Dignam with final version of application to vacate arrests of Da Li and Lady Fatima. Reviewing application. Email response to Orr Dignam with confirmation to file application as revised on Sunday, 22nd July, email response to Orr Dignam re bareboat charterparty for Lady Fatima, email reports to Sea Consortium on application and bareboat charterparty issues.

1.0

23/07/2007	D Janssen	<p>Email from Freehill, Hogan & Mahar; emails from Dr Zahir; Perusing email correspondence of Jeffrey Lim with Capt Chowdhury of SeaCon Bangladesh, email from Yong Lim Kong of SeaCon re progress and bank guarantee, attempts to telephone Orr Dignam and email seeking report on proceedings and position, email response to Yong Lim Kong; email from Tara Davenport of Rajah & Tann on seizure of Banga Borat, email response to Tara Davenport with GG Lucas valuation report and email report SeaCon and RaetsAsia seeking instructions; email from Toh Kian Sing on procedure for sale of Banga Borat; discussing matter in telcon with Simon Davidson; email from Stephanie Schweitzer of HFW Paris on third service of attachment order catching further funds, email response to HFW Paris with queries on procedure and email report to Sea Consortium and RaetsAsia with revised spreadsheet of all funds attached to date, email to Rajah & Tann to advise attachment position.</p>	3.0
24/07/2007	D Janssen	<p>Email correspondence with Sea Consortium re seizure of Banga Borat; Emails from Orr Dignam and HFW Paris; Email report and recommendations to Sea Consortium and RaetsAsia on Bangladesh proceedings and providing security by bank guarantee, telcon with Lim Teck Joo of Sea Consortium; email report to Sea Consortium and RaetsAsia on attachment proceedings in France, email response to Stephanie Schweitzer of HFW Paris; Email to Orr Dignam re bank guarantee arrangements; Email from Yong Lim Kong with formal valuation report for Banga Borat, forwarding this by email to Rajah & Tann for instructions to Sheriff; Email from Yong Lim Kong enquiring about time-table for sale of Banga Borat, reviewing advice from Rajah & Tann and informing Yong Lim Kong of the sheriff's time table; email correspondence with Rajah & Tann re position on garnishee orders and reporting to Sea Consortium and RaetsAsia; email from Toh Kian Sing of Rajah & Tann re attachments and instructions to sheriff and email reply; email enquiry from Jeffrey Lim re MLO's reaction to garnishee orders and asking Rajah & Tann to advise, telcon with Kendall Tan of Rajah & Tann and advising Jeffrey Lim; telcon with and email from Tara Davenport of Rajah & Tann re valuation, email request to GG Lucas to issue valuation report without qualifications; discussing matter in telcon with Simon Davidson; email to arbitrator to rule on urgent application in view of HRC's failure to respond on time.</p>	4.5

25/07/2007	D Janssen	<p>Email from Orr Dignam re bank guarantee arrangements, email response to Orr Dignam, email report to Sea Consortium and RaetsAsia, email from Lim Teck Joo of Sea Consortium with bank requirements, email response and email request to Orr Dignam; courier letter from Dr Zahir; emails from Yong Lim Kong of SeaCon with queries on Banga Borat valuation and instructions re bank guarantee, email response to Yong Lim Kong and email instructions to Rajah & Tann re Banga Borat, email reminder to Orr Dignam re outstanding advices on ship mortgages; telcon from Yong Lim Kong and to Wei Yen Yip of Rajah & Tann re guidance to MLOs about answering garnishee orders served on them, receiving sample garnishee order by email from Rajah & Tann and forwarding this to Sea Consortium with guidance for local representatives of MLOs; emails from Jeffrey Lim and to Rajah & Tann re SeaCon's correspondence with MLOs, email response from Kendall Tan of Rajah & Tann, further query by Jeffrey Lim and explanation by email in response; Telcons and email correspondence with Tara Davenport and Toh Kian Sing of Rajah & Tann re sheriff's requirements for valuation of the Banga Borat; Email from Yong Lim Kong, email response with report and recommendations on proceedings in London, Bangladesh and Singapore; email from Jeffrey Lim re further attachments in France, email response to SeaCon and email instructions to HFW Paris to arrange a fourth service of the French attachment order; email from arbitrator Mark Hamsher with order for directions, email response with requested report on Bangladeshi proceedings, email information and request for court papers as filed to Orr Dignam, email report to Sea Consortium and RaetsAsia.</p>	5.2
26/07/2007	D Janssen	<p>Email from Orr Dignam re mortgages over HRC's ships and bank guarantee, email response and report to Sea Consortium and RaetsAsia, email correspondence with Sea Consortium and Orr Dignam re bank guarantee arrangements and requirements; email from Rajah & Tann re sheriff's appointment of surveyor to value Banga Borat and report to Sea Consortium; Receiving, reviewing and collating bundle of garnishee summons, affidavits and orders to show cause as served on MLOs by Rajah & Tann, arranging copy set to be prepared and forwarded to Sea Consortium; Email from Rajah & Tann re garnishee's request for affidavits and sheriff's concerns over crew repatriation, email response to Rajah & Tann, email report and recommendations to Sea Consortium and RaetsAsia, email from Jeffrey Lim re mortgages, email from Yong Lim Kong confirming instructions, email query to Rajah & Tann re service of garnishee order on HRC Shipping of Singapore; email from Orr Dignam with details for bank authorisation, forwarding this by email to SeaCon.</p>	3.1
26/07/2007	S S Davidson	<p>Reviewing correspondence and discussion with Dirk Janssen.</p>	0.2
27/07/2007	S S Davidson	<p>Receiving details of mortgages on vessels and discussion with Dirk Janssen. Call to Rajah & Tann.</p>	0.6

27/07/2007

D Janssen

Emails from Orr Dignam and Dr Zahir, considering reports on hearing and reviewing court documents filed in Bangladesh; Email advices from HFW Paris on French proceedings, responses and replies; Discussing and considering matters with Simon Davidson; Liaising with Yong Lim Kong and Jeffrey Lim over documents and instructions for Orr Dignam and issues arising from the seizure of the Banga Borat, the garnishing of MLOs in Singapore, and the arrangements for security by bank guarantee, email instructions and telcon with Hafizullah of Orr Dignam, Liaising with Rajah & Tann in respect of all issues in email correspondence, telcons and teleconference with Simon Davidson; Email reports and recommendations to Sea Consortium and RaetsAsia on all issues; Fax from Mike Unger of Freehills and detailed instructions by email in response with relevant documents from Singapore enforcement proceedings.

5.3

30/07/2007

S S Davidson

Reviewing correspondence and discussion with Dirk Janssen. Call from Tim Hartnoll. Reviewing advice from Dr Zahir of Orr, Dignam. Email to Tim Hartnoll.

0.7

30/07/2007

D Janssen

Email from Tara Davenport of Rajah & Tann on garnishee order; Email from Mike Unger of Freehill Hogan & Mahar on US Rule B attachment proceedings; Emails from Timothy Clemens-Jones of Holman Fenwick & Willan Paris on French conservatory attachment proceedings and approach by Watson Farley & Williams Paris office to settle challenges; Several telephone conversations with Toh Kian Sing and Tara Davenport of Rajah & Tann on garnishee proceedings and sale of seized Banga Borat; discussing and considering matter with Simon Davidson; liaising with Jeffrey Lim of Sea Consortium over ship mortgage documentation; telcons with Orr Dignam and email report on hearing from Dr Zahir, email responses and instructions to Dr Zahir and Orr Dignam.

3.2

Total: 92.8

SUMMARY

		Hours Charged	Hourly Rate	Total
Partner	Simon Davidson	5.1	S\$775	S\$ 3,952.50
Assistant Solicitor	Dirk Janssen	87.3	S\$600	S\$ 52,380.00
Total :				<u>S\$ 56,332.50</u>

HFWSP\96214-1

Telephone (33) 1 44 94 40 50
Fax (33) 1 42 65 46 25

E-mail holmans@hfw-france.com

VAT N° : FR11311167787

HFW SINGAPORE
10 COLLYER QUAY
08-02 OCEAN BUILDING
049315 SINGAPORE
SINGAPORE

Y/Ref :
O/Ref : TCJ/SSW/hr 339861

Invoice N°: 2007 1 0797
- 29 June 2007 -

For the attention of Simon Davidson / Dirk Janssen

SEA CONSORTIUM / HRC SHIPPING
Matter N° 106560028

Fees (Honoraires)

To our professional services from 16/03/2007 to 28/06/2007 (see attached detail) € 8 370.00

Disbursements (débours)
(See attached detail)

€ 737.88

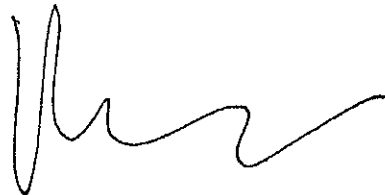
TOTAL

€ 9 107.88

Exempt from VAT – article 259 B Code Général des Impôts
Non assujetti à la TVA article 259 B CGI

Payment on receipt of invoice

"Membre d'une association agréée – le règlement des honoraires par chèque est accepté."



Direct remittance may be made to Crédit Agricole (Centre d'Affaires Paris International), 49-51 avenue George V,
75008 Paris, France
IBAN : FR76 1820 6004 3259 0270 9115 006
SWIFT (BIC) : AGRIFRPP882

The above is the principal place of business, at which a list of partners' names is available

SEA CONSORTIUM / HRC SHIPPING

Matter N°: 106560028

Narrative detail :

Initials	Date	Time	Narrative detail
TCJ	16/03/07	0h45	E-mail in HFW Singapore Perusal, e-mail out HFW Singapore, e-mail in + out HFW Singapore (x 3)
TCJ	21/03/07	0h20	E-mail in HFW Singapore Perusal
SSW	22/03/07	2h00	JAAMI reviewing the documents
TCJ	22/03/07	0h45	Perusal e-mail out HFW
TCJ	23/03/07	0h05	E-mail in Janssen, e-mail out Janssen
SSW	28/03/07	0h30	Telephone conversation with the process server and fax out Bonnefous
TCJ	28/03/07	0h20	E-mail in + out HFW Singapore
TCJ	29/03/07	0h15	E-mail in + out HFW Singapore
SSW	30/03/07	0h45	fax out to the bailiff; email out HFW Singapore
TCJ	30/03/07	0h20	E-mail in + out HFW Singapore
TCJ	02/04/07	0h15	E-mail in HFW Singapore
SSW	04/04/07	0h30	telephone conversation with the process server, and email out TCJ on CMA's declaration
TCJ	04/04/07	0h15	Perusal discussing SSW
TCJ	05/04/07	0h20	E-mail in Huissier, e-mail out HFW Singapore
TCJ	06/04/07	0h05	E-mail in + out HFW Singapore
TCJ	10/04/07	0h15	-mail in + out HFW Singapore
TCJ	11/04/07	0h05	E-mail in HFW Singapore
SSW	17/04/07	1h30	researches on enforcement of the award and email out HFW and exchange of emails with Dirk Janssen
TCJ	17/04/07	0h30	E-mails in + out HFW Singapore (x 7)
SSW	19/04/07	0h20	Email out HFW Singapore
TCJ	19/04/07	0h15	E-mail in Singapore / SSW
SSW	20/04/07	0h20	Email out HFW Singapore and fax out Bonnefous
TCJ	20/04/07	0h20	E-mail in HFW Singapore / SSW
SSW	24/04/07	0h30	Telephone conversation with the process server and with the translator and email out HFW Singapore
SSW	25/04/07	0h20	preparing the file for the enforcement.
SSW	26/04/07	1h30	application before the civil court
SSW	10/05/07	0h15	conf with the court clerk on the application

SSW	24/05/07	0h30	studying the claim for and email out HFW Singapore
SSW	25/05/07	0h30	fax out HFW Singapore
SSW	28/05/07	0h30	researches and drafting submissions
SSW	29/05/07	1h30	drafting submissions in reply
SSW	30/05/07	2h00	email out HFW London
SSW	31/05/07	1h00	finalising the email out to HFW Singapore
TCJ	08/06/07	0h15	E-mail in + out HFW Singapore
TCJ	11/06/07	0h20	Perusal amendment fax out HFW Singapore
SSW	12/06/07	0h30	email in Dirk Janssen and email out
TCJ	12/06/07	0h15	Perusal e-mails
TCJ	19/06/07	0h10	E-mail in HFW Singapore
SSW	21/06/07	0h30	telephone conversation with CGM CGM and email out
SSW	25/06/07	0h15	email in CMA CGM; translation and email out HFW Singapore
TCJ	27/06/07	0h20	E-mails in + out HFW Singapore
SSW	28/06/07	0h45	perusal of documents and emails; fax to the process server and fax to WFW

Hourly rate and billed time by lawyer :

Initials	Lawyer	Hourly rate	Total time	Total amount
SSW	Stéphanie SCHWEITZER	330.00 €	16h30	5 445.00 €
TCJ	Timothy CLEMENS-JONES	450.00 €	6h30	2 925.00 €
Total			23h00	8 370.00 €

Disbursement detail :

Date	Disbursement detail	Amount
05/04/07	Bonnefous - Fa 0703703	149.32 €
24/04/07	Arlaud - Frais actes	413.88 €
29/05/07	Arlaud - actes du 18 + 19.4.07	174.68 €
Total disbursements		737.88 €

Case 1:07-cv-09443-PAC
Sea Consortium Pte Ltd
11 Duxton Hill
Singapore 089595

Document 9-6

Filed 04/04/2008 Page 14 of 25

3 Church Street
#19-03
Singapore 049483

Tel +65 6534 0195
Fax +65 6534 5864

holmans@hfw.com.sg
www.hfw.com

Attention: Messrs Tim Hartnoll/Tristan Howitt

TAX INVOICE
GST REG NO: M9-0005261-C

Date: 31 August 2007

Our Ref: SSD/10656/22/iy

Bill No.: S08150


JAAMI
Period Covered : 31 July to 30 August 2007

To our professional charges for all advice and assistance given in this matter as set out in the attached breakdown of time spent.

Our fees :	S\$ 72,297.50
+7% GST	S\$ 5,060.83

Disbursements:	
Courier, telephone, photocopying charges, and other incidentals	S\$ 162.65
+7% GST	S\$ 11.39

Total	<u>S\$ 77,532.37</u>
--------------	-----------------------------


HOLMAN FENWICK & WILLAN
HFWSP\101330-1

Direct remittance may be made to The Hong Kong and Shanghai Banking Co. Ltd.
Collyer Quay Branch, 21 Collyer Quay, Singapore 049320, quoting our bill no.
GB Pounds A/C 260-258843-181 Swift Code: HSBCSGSG
Singapore Dollars A/C 141-364083-002 Swift Code: HSBCSGSG
US Dollars A/C 260-258843-180 Swift Code: HSBCSGSG
If paying by cheque, please return the attached copy with your payment.
Please pay net of all bank charges.

Breakdown of Time on a Daily Basis

HFV Bill No S08150

Club Ref NA
 Our File No 00010656 / 00000022
 Client Sea Consortium Pte Ltd
 Matter SX Jaami / X-Press Resolve / X-Press Manaslu
 Transaction
 Date FE Name

Hours

Date	FE Name	Description	Hours
31/07/2007	D M Janssen	Emails from Orr Dignam and Dr Zahir on hearing of application to set aside arrest order, email reply to Dr Zahir; reviewing email recommendations to Sea Consortium on bank guarantee; email from Tara Davenport on garnishee proceedings and email response with instructions re Evergreen represented by Gurbani & Co; discussing and considering matter with Simon Davidson; email reports to Sea Consortium and RaetsAsia on garnishee proceedings in Singapore and admiralty action hearing in Bangladesh, further email correspondence with Rajah & Tann and Sea Consortium re garnishee proceedings; long telcon with Yong Lim Kong to clarify and explain position in various jurisdictions; report from and email correspondence with Rajah & Tann re sheriff's correspondence with HRC Singapore in respect of crew wages and repatriation costs, email report to Sea Consortium and RaetsAsia.	3.6
31/07/2007	S S Davidson	Reviewing correspondence. Email to clients. Discussion with Dirk Janssen.	0.4
01/08/2007	S S Davidson	Emails from Orr Dignam and Dr Zahir. Discussion with Dirk Janssen and review report to clients. Further exchange with clients.	0.7
01/08/2007	D M Janssen	Email enquiry from Yong Lim Kong of Sea Consortium on HRC ship mortgages; Email report on hearing in Bangladesh from Orr Dignam; discussing and considering matter with Simon Davidson, email report to Sea Consortium and RaetsAsia; Emails to and telcons with Mr Hafizullah and Dr Zahir for further advice on progress of hearing and likely time for decision and judgment, briefing Simon Davidson, drafting report and recommendations re bank guarantee, reviewing this with Simon Davidson, email to Tim Hartnoll cc Sea Consortium and RaetsAsia; Emails from A Hossain & Associates coming off the record and from Yong Lim Kong re newspaper articles in Bangladesh, discussing and considering response with Simon Davidson, perusing email replies and recommendations; email to Yong Lim Kong on query re Bangladeshi ship mortgage information; Considering email report from and late night telcon with Mr Hafizullah of Orr Dignam. Briefing Simon Davidson. Perusing his email report to Sea Consortium.	2.8

02/08/2007	D M Janssen	Email responses and instructions to Dr Zahir and Orr Dignam; Perusing and responding to email queries from Yong Lim Kong of Sea Consortium on seizure and sale of Banga Borat by email and in telcons; Email from arbitrator Mark Hamsher and response with application for final and peremptory order and detailed report on Bangladeshi action; Discussing and considering matters with Simon Davidson; Email from Rajah & Tann on WP approach by Lawrence Fong; Email report from and late night telcon with Mr Hafizullah of Orr Dignam, email report to Sea Consortium and RaetsAsia.	4.9
02/08/2007	S S Davidson	Emails from Orr Dignam and Dr Zahir. Discussion with Dirk Janssen and email to clients. Email from arbitrator. Call from Tim Marshall. Various emails from Sea Consortium and reply.	0.9
03/08/2007	D M Janssen	Email report on hearing from Dr Zahir; Email response and instructions to Dr Zahir; Liaising by email correspondence and in telcons with Dr Zahir and Jeffrey Lim over preparation and execution of powers for high court and agents' letters of authority, drafting letters for execution and notarisation; Discussing and considering matters with Simon Davidson, reviewing email responses and recommendations on settlement and garnishee of HRC Shipping of Singapore; Email from Yong Lim Kong on Lawrence Fong's approach to garnishee, forwarding this to Rajah & Tann; Telcons with Toh Kian Sing of Rajah & Tann on garnishee procedure for order absolute against HRC Shipping of Singapore and approaches by Lawrence Fong to garnishees and on settlement; Telcon with and email response to Lawrence Fong with claim schedules; Email from Tara Davenport of Rajah & Tann with Sheriff's notice of sale by public auction of Banga Borat; Drafting letter to ship mortgagee bank and email draft to Yong Lim Kong with sheriff's notices; Email query from Yong Lim Kong on public auction terms and procedure and email to Rajah & Tann seeking their advice; Email reports o Sea Consortium and RaetsAsia; Collating documents.	8.0
03/08/2007	S S Davidson	Reviewing advice from Bangladesh. Calls to Lawrence Fong and Rajah & Tann. Reporting to clients on settlement and garnishee against UOB. Call from Tim Hartnoll.	1.2
05/08/2007	D M Janssen	Perusing email from Capt Chowdhury of Sea Consortium Bangladesh.	0.1
06/08/2007	S S Davidson	Reviewing emails and discussion with Dirk Janssen.	0.4

06/08/2007	D M Janssen	<p>Considering advices on mortgages received from Capt Chowdhury of Sea Consortium Bangladesh, email with recommendations to Sea Consortium and RaetsAsia, email for information to Rajah & Tann; Email from Toh Kian Sing and discussing this with Simon Davidson, considering garnishee of HRC Shipping of Singapore and its account at UOB with Simon Davidson, email enquiry to Rajah & Tann on garnishee orders absolute; Courier letter from Dr Zahir with Vokatnama forms (Power for High Court) and email response; Email from Rajah & Tann on garnishee orders, forwarding enquiry on addresses for service to Yong Lim Kong, email response to Rajah & Tann seeking advice on possible steps against HRC Shipping of Singapore and its bank account, telcon with Toh Kian Sing and briefing note to Simon Davidson; Email from Rajah & Tann on procedure for sale by auction of Banga Borat, forwarding advice to Yong Lim Kong and seeking information on HRC vessel's calling at Singapore and Malaysia and MLO representatives at Port Klang in Malaysia; Email from Yong Lim Kong on newsletter publicity, discussing this with Simon Davidson and reviewing his response; late night telcon with Mr Hafizullah of Orr Dignam and briefing Simon Davidson.</p>	2.2
07/08/2007	D M Janssen	<p>Discussing and considering matter with Simon Davidson in light of Mr Hafizullah's report by email and in telcon of last night; Email enquiry to Dr Zahir; Email from HFW Paris on further service of attachment order, email report to Sea Consortium and RaetsAsia; Email from Yong Lim Kong on business addresses for service of garnishee order, email response and email information to Rajah & Tann, email reply from Tara Davenport of Rajah & Tann and response suggesting service also on directors of HRC Shipping in Singapore; Email from Yong Lim Kong on HRC switching ships calling at Singapore, reviewing writs of seizure and sale, forwarding information on HRC calls by email to Rajah & Tann with instructions to amend writ to include entire fleet; Telcon with Yong Lim Kong re hearing in Bangladesh, forwarding Orr Dignam's report by email with recommendations for further Vokatnama's to be issued by Owners to Orr Dignam; Preparing Powers for High Court (Vokatnama) for Owners to sign and seal; telcons with Nasreen Hafiz of Orr Dignam; Email from Yong Lim Kong on publication of award, discussing and considering this with Simon Davidson and briefing Michael Buisset to research the point; Reviewing and amending application to Mark Hamsher for final and peremptory order for service of defence submissions by HRC, perusing email application; Liaising with Rajah & Tann over service and effect of garnishee orders; telcon with Yong Lim Kong re garnishee proceedings; receiving notice of conclusion of hearing in Bangladesh and briefing Simon Davidson, email report and recommendations to Sea Consortium and RaetsAsia; Liaising with Jeffrey Lim of SeaCon over putting a hold on preparations of Vokatnamas; Email instructions to Rajah & Tann to extend writ of seizure and sale to HRC's entire fleet and to serve garnishee order on HRC Singapore's local director, telcon with Toh Kian Sing to discuss procedures.</p>	4.3
07/08/2007	M M Buisset	<p>Researching case law on publication of arbitration award. Telephoning Sarah Johnson in order to ask to provide further information on London leave to appeal proceedings</p>	1.0

07/08/2007	S S Davidson	Review advice from Orr, Dignam and the written objections from HRC Shipping. Discussion with Dirk Janssen. Email from Yong Lim Kong. Receiving report on hearing from Orr, Dignam and report to clients. Call from Tim Hartnoll in the evening.	0.9
08/08/2007	M M Buisset	Further legal research and drafting memo on whether case law allows publications of arbitration awards, following court proceedings	1.6
08/08/2007	S S Davidson	Reports from Orr Dignam and Dr Zahir. Report to clients. Further submissions to Mr Hamsher. Email from Mark Hamsher and report to clients.	0.8
08/08/2007	D M Janssen	Discussing and considering matter with Simon Davidson; perusing emails from Orr Dignam and Dr Zahir, considering further application filed on behalf of HRC to reject agent's certificate; reviewing position on garnishees and seeking update from Rajah & Tann; Email from HFW London on confidentiality of arbitration award and judgment on application for leave to appeal award; Considering memorandum on confidentiality of arbitration award prepared by Michael Buisset; Reviewing and amending report and submissions to arbitrator, liaising with Yong Lim Kong and Jeffrey Lim of SeaCon to obtain figures for loss and expense incurred due to arrest of Da Li, calculating/estimating further losses, perusing email to arbitrator as sent with indications of figures; Perusing emails from Rajah & Tann on garnishee proceedings and copies of correspondence with garnishees and HRC's Singapore solicitor Lawrence Fong, discussing this with Simon Davidson, email response to Rajah & Tann; Telcon with Yong Lim Kong re authority for Bangladesh proceedings; email instructions to Orr Dignam and Dr Zahir; Emails from Jeffrey Lim of SeaCon on sale of Banga Borat and London arbitration proceedings, discussing these with Simon Davidson; Email order from arbitrator Mark Hamsher, reviewing report to clients, email response to arbitrator re HRC's Singapore solicitors; email response to Jeffrey Lim in this respect.	4.5
10/08/2007	S S Davidson	Considering correspondence and discussion with Dirk Janssen. Email exchange with clients.	0.5
10/08/2007	D M Janssen	Email from arbitrator Mark Hamsher; Reviewing and amending draft affidavit in support of garnishee order against HRC Shipping Singapore's bankers UOB, liaising with Kendall Tan over amendments, attending at Rajah & Tann's offices for execution of affidavit and to discuss garnishee proceedings generally; Emails from Dr Zahir; Courier letter from Orr Dignam with powers of attorney for owners to execute for High Court and Appeal in Bangladesh, email response and instructions to Dr Zahir and Orr Dignam, drafting powers for Dr Zahir, email instructions to and liaising with Jeffrey Lim of SeaCon for execution of powers by email and in telcons; Emails from Rajah & Tann with sheriff's notice of valuation of Banga Borat and survey report and notice of appointment of new solicitors for HRC Shipping; Email report and recommendations to SeaCon on sale of Banga Borat and garnishing of MLOs and HRC Shipping of Singapore; Email to arbitrator re new solicitors for HRC and response; Liaising with Rajah & Tann and SeaCon in respect of asking sheriff to invite mortgagee bank to participate; Drafting press release SeaCon, reviewing and amending this with Simon Davidson, email draft to Tristan Howitt of SeaCon with advice on confidentiality of arbitration awards.	6.3
13/08/2007	S S Davidson	Meeting with Rajah & Tann. Discussion with Dirk Janssen.	0.4

13/08/2007	D M Janssen	Email and courier letter from Dr Zahir re powers for appellate division, email response to Dr Zahir, liaising with Jeffrey Lim and Dr Zahir to arrange execution and return by express courier; Email from Kendall Tan of Rajah & Tann re sheriff's sale of Banga Borat, liaising with Jeffrey Lim over invitation to mortgagee bank NCCB to participate; Email from and telcon with Tristan Howitt re press release; Email confirmation of execution of Powers from Jeffrey Lim and forwarding these to Dr Zahir by email; Emails from Rajah & Tann re garnishee orders, discussing these with Simon Davidson and responding by email; Meeting with Toh Kian Sing and Kendall Tan of Rajah & Tann to discuss garnishee proceedings and sale of Banga Borat.	2.2
14/08/2007	S S Davidson	Reviewing correspondence and reports of the Bangladesh proceedings. Discuss with Dirk Janssen and call to Sea Consortium. Call from Rajah & Tann.	0.7
14/08/2007	D M Janssen	Faxed emails from Mike Unger of Freehill's, considering forwarded application filed by WFW in New York to vacate attachments of HRC Singapore's funds transfers, reviewing draft declarations for Yong Lim Kong and Dirk Janssen in reply; Discussing and considering matter with Simon Davidson, email to Mr Hafizullah of Orr Dignam and Dr Zahir; Email from and telcon with Toh Kian Sing of Rajah & Tann re application for stay of execution, email report to Sea Consortium and RaetsAsia, emails to Rajah & Tann; further countless emails to and from Rajah & Tann, Sea Consortium and Freehills, long telcons with Yong Lim Kong, Toh Kian Sing and Kendall Tan, as well as Mike Unger of Freehills, discussing and considering proceedings in Singapore and the US of A; telcon and email reports from Orr Dignam and Dr Zahir on judgment in Bangladesh, reporting to and advising Sea Consortium and RaetsAsia throughout the day on challenges to garnishee proceedings and attachments, email instructions to Mike Unger, email to arbitrator with update on developments and seeking award.	8.8
15/08/2007	D M Janssen	Email from arbitrator Mark Hamsher; Emails from Mike Unger of Freehill's with revised declarations for Yong Lim Kong and Dirk Janssen; Email from Jeffrey Lim and email response on extent of garnishee attachments; Email reports and recommendations to Yong Lim Kong on garnishee proceedings and valuations of Banga Borat; Email correspondence and telephone conversations with Kendall Tan and Tara Davenport of Rajah & Tann in respect of sale of Banga Borat and garnishing of UOB and MLOs; Email to Dr Zahir and Mr Hafizullah enquiring about likely availability of judgment for arbitrator; Reviewing and amending declarations for Yong L K and D M Janssen, email to Yong Lim Kong with final revision of declaration, email from Sea Consortium with scan of Yong's signed statement, email response and forwarding this by email to Mike Unger of Freehills, further drafting additional statements for declaration of D M Janssen; telcon from Mr Hafizullah of Orr Dignam on HRC's application to court of appeal for stay of order setting aside arrest, briefing Simon Davidson, email reply to Mr Hafizullah with instructions, email enquiry to Dr Zahir, email report and response to arbitrator Mark Hamsher; email report to Sea Consortium and RaetsAsia; finalising draft declaration for Dirk Janssen, email revised draft with scanned signed version to Mike Unger of Freehill's and following up with telcon.	7.7
15/08/2007	S S Davidson	Reviewing correspondence and discussion with Dirk Janssen.	0.4

16/08/2007	S S Davidson	Reviewing correspondence and discussion with Dirk Janssen. Reply to Tristan Howitt's email.	0.4
16/08/2007	D M Janssen	Emails from Mike Unger of Freehill's; Discussing and considering Dr Zahir's report with Simon Davidson, email response to Dr Zahir; Email from Yong Lim Kong seeking further advice from Orr Dignam on how to prevent future wrongful arrests, email response to Yong Lim Kong email reminder to Mr Hafizullah; Email to Rajah & Tann for rebuttal of 'oversecured' argument; Considering with Simon Davidson the prospect of excess funds from sale of Banga Borat and how to prevent their release, telcon with Kendall Tan of Rajah & Tann for advice on stop order; Reviewing advice on counsel in Bangladesh and perusing email response to Tristan Howitt; Telcon with and emails from Tara Davenport on garnishee proceedings, reviewing Rajah & Tann's correspondence with garnishees and their solicitors; further emails from Rajah & Tann on sheriff's correspondence with mortgagee bank and HRC Shipping's solicitors in Singapore; Late night sms and telcon with Mr Hafizullah of Orr Dignam for update on arrest proceedings, reporting to SeaCon, perusing Mr Hafizullah's email report and advice, further reporting to SeaCon.	3.0
17/08/2007	S S Davidson	Advice on vexatious litigant. Discussion with Dirk Janssen.	0.8
17/08/2007	D M Janssen	Briefing Simon Davidson and discussing Bangladesh action, email response to Mr Hafizullah, email seeking advice from Dr Zahir and telcon with Dr Zahir; collating correspondence with garnishees forwarded by Rajah & Tann; Discussing, researching and considering court's inherent jurisdiction to restrain vexatious litigant with Simon Davidson; Telcon from Kendall Tan reporting on hearing of HRC Shipping's application for a stay of garnishee proceedings; Email from Mike Unger of Freehill's with Yong's declaration as filed, the memorandum of law and affirmation of Mike Unger in reply to the application to vacate the attachments, liaising with Mike Unger over revised declaration for Dirk Janssen; Email to Mark Hamsher with report on HRC persisting with maintaining their wrongful arrest; Telcon with Mike Unger of Freehills, email to Mike Unger with another scanned copy of signed declaration and instructions for amendment and substitution.	3.7
19/08/2007	D M Janssen	Telcon with Mr Hafizullah and Ms Nasreen of Orr Dignam. Briefing Simon Davidson and Yong Lim Kong in telcons. Email report from Orr Dignam. Email response and email report to Sea Consortium and RaetsAsia.	0.5

20/08/2007	D M Janssen	Discussing and considering matter with Simon Davidson, reviewing and collating correspondence and court documents forwarded by Mike Unger of Freehill's and Kendall Tan of Rajah & Tann; Email from Dr Zahir, report to SeaCon and RaetsAsia, receiving instructions and instructing Dr Zahir to apply to stay and strike out action; Email advice and recommendations on London arbitration to SeaCon; Email report on US attachment proceedings to SeaCon and RaetsAsia; telcons with and emails from Tara Davenport and Kendall Tan of Rajah & Tann re garnishee proceedings, considering R&T's correspondence with garnishees and HRC Shipping's Singapore solicitors, reviewing and amending draft circular to MLO garnishees and draft response to HRC's solicitors, briefing Simon Davidson; Email from Orr Dignam confirming release of Da Li, response and report to SeaCon and RaetsAsia; Email comments on HRC Singapore's memorandum of law to Mike Unger of Freehill Hogan & Mahar.	5.5
20/08/2007	S S Davidson	Reviewing correspondence and discussion with Dirk Janssen.	0.3
21/08/2007	S S Davidson	Email from Dr Zahir and reply. Call to Yong. Email from Rajah & Tann regarding mortgage. Discussion with Dirk Janssen.	0.6
21/08/2007	D M Janssen	Collating and reviewing email correspondence; Email from Yong Lim Kong, forwarding this to Kendall Tan of Rajah & Tann to respond, telcons with Kendall Tan thereon; Email from Dr Zahir, discussing this with Simon Davidson and perusing email response; Email from Tara Davenport of Rajah & Tann with draft affidavit in reply to HRC's application to stay and/or set aside garnishee orders, reviewing and amending draft affidavit, email with revised draft to Rajah & Tann; teleconferences with Toh Kian Sing and Kendall Tan together with Simon Davidson, discussing and considering sale by auction of Banga Borat, sheriff's approach and NCCB bank's involvement; Email application to arbitrator to allow quantification of damages and publish one award, email reports to SeaCon and RaetsAsia on London and Singapore proceedings.	4.0
22/08/2007	S S Davidson	Conference calls with Rajah & Tann about sale of vessel. Various discussions with Dirk Janssen.	0.7
22/08/2007	D M Janssen	Emails from Dr Zahir, discussing and reviewing response with Simon Davidson by reference to earlier decision to stay in favour of arbitration; Email from Mark Hamsher re inclusive award; Email from Mike Unger of Freehill's reporting on hearing in New York; Email correspondence and teleconference with Toh Kian Sing, Kendall Tan and Tara Davenport of Rajah & Tann together with Simon Davidson; Telcon with Tara Davenport re affidavit in reply to application to stay execution and/or set aside garnishee orders; Telcons with Kendall Tan re Yong Lim Kong's questions on procedure for sale by auction of Banga Borat; Further emails from Rajah & Tann on garnishee proceedings; Email from and telcon with Kendall Tan on sale of Banga Borat; email from Yong Lim Kong on quantum of claim; Email from Dr Zahir on applications to be made in Bangladesh.	3.0

23/08/2007	D M Janssen	Email from Dr Zahir; Emails from Rajah & Tann with update and correspondence re garnishees; Telcons with Tara Davenport re affidavit in reply to HRC's application to stay or set aside garnishees, attending at Rajah & Tann's offices to swear affidavit; Email from Kendall Tan with advice on stop order for excess funds in court, email response to and telcon with Kendall Tan seeking further clarification; Email report to SeaCon and RaetsAsia on garnishee proceedings with revised spreadsheet of status of monies attached and paid.	3.7
24/08/2007	S S Davidson	Reading emails and telephone discussion with Dirk Janssen.	0.5
24/08/2007	D M Janssen	Email from Rajah & Tann re update of total sums outstanding for re-issue of writ of seizure and sale against other vessel's in HRC's fleet; Email from Yong Lim Kong on further action to take against HRC Singapore over failure to respond to garnishee orders; Emails from and telcon with Toh Kian Sing of Rajah & Tann on intention of NCCB's solicitors arresting the Banga Borat, email report and recommendations to SeaCon and RaetsAsia; Email response from Yong Lim Kong; Discussing and considering matter in teleconversations with Simon Davidson and Toh Kian Sing; Emails from Rajah & Tann on garnishee proceedings and sale of Banga Borat, instructions and responses to R&T by email and in telcons with Kendall Tan, email reply and report to Yong Lim Kong.	3.8
27/08/2007	D M Janssen	Emails from Rajah & Tann on garnishee proceedings and sale of Banga Borat; Telcons with Toh Kian Sing re mortgagee bank's arrest of Banga Borat, email report to SeaCon and RaetsAsia; Email from Jeffrey Lim of SeaCon with figures for loss and damage arising from arrest of Da Li and in relation to Lady Fatima; telcons with Tara Davenport of Rajah & Tann re reissued Writ of Seizure and Sale and mortgagee bank's claim to seized Banga Borat; Email from Rajah & Tann with bank's claim papers and sheriff's notices; calculating interest due under second award to date and providing Rajah & Tann with up to date spreadsheet table; Email reports from Rajah & Tann and to SeaCon cc RaetsAsia on sale of Banga Borat, further telcons with Toh Kian Sing and Yong Lim Kong; briefing Simon Davidson in telcon; briefing by Toh Kian Sing from Singapore court on warrant of arrest just served and informing Yong Lim Kong by telcon; Reviewing and amending Dr Zahir's draft applications, email with revised versions and HRC's withdrawals of petitions for leave to appeal to Dr Zahir.	5.0
27/08/2007	S S Davidson	Long call to Holmans Singapore.	0.3
28/08/2007	S S Davidson	Reviewing correspondence and discussion with Dirk Janssen.	0.4

28/08/2007	D M Janssen	Telcons with Toh Kian Sing and Yong Lim Kong over auction of Banga Borat; Email from Dr Zahir and resending last night's emails with revised draft application for stay and rejection to Dr Zahir; briefing Simon Davidson; email response from Dr Zahir; email to Jeffrey Lim to arrange for Capt Chowdhury to affirm affidavits, perusing email instructions from Jeffrey to Capt Chowdhury and his response; Email advice from Toh Kian Sing of Rajah & Tann on arrest hearing and proceedings, email report to SeaCon and RaetsAsia, email reply to Rajah & Tann; Email report from Tara Davenport of Rajah & Tann on failed auction of Banga Borat and telcon with Toh Kian Sing, email report to SeaCon and RaetsAsia, discussing and considering matter with Simon Davidson, email correspondence and telcons with Kendall Tan of Rajah & Tann re garnishee proceedings, in particular against HRC Shipping of Singapore, email report to SeaCon and RaetsAsia; Email advice from Rajah & Tann on stop order for potential excess of funds in court, briefing Simon Davidson and response to Kendall Tan; Email from and telcon with Tara Davenport re writs of seizure and sale for other vessels in HRC Shipping's fleet, reviewing drafts, instructions to Rajah & Tann.	4.0
29/08/2007	S S Davidson	Reviewing correspondence. Advising upon distribution of funds.	0.4
29/08/2007	D M Janssen	Updating interest calculation for sums due under second award, email to Rajah & Tann with up to date calculation for writ of seizure and sale for HRC fleet; Email from Mike Unger of Freehill's on hearing of HRC's application to free HRC Singapore's funds, email response with report on auction, email report to SeaCon and RaetsAsia; Email from Dr Zahir on applications to stay and reject HRC's second action in Bangladesh; Discussing and considering evidence for application to tribunal with Simon Davidson; Telcon and email correspondence with Jeffrey Lim over supporting documents for further claims; telcon with Kendall Tan of Rajah & Tann re affidavit in further reply to HRC's application to set aside garnishee orders; reviewing and amending that affidavit as well as further affidavit sent by Tara Davenport for intervention in bank's admiralty action, telcons and email correspondence with both about revisions of affidavits and status of garnishee proceedings; Briefing Simon Davidson; Email correspondence with Yong Lim Kong and discussions with Simon Davidson re stop order for excess funds from sale of Banga Borat.	5.6
30/08/2007	S S Davidson	Reviewing correspondence and discussions with DMJ.	0.4
30/08/2007	D M Janssen	Email from Mike Unger of Freehill's; Liaising with Rajah & Tann by email correspondence and in telephone conversations over mortgagee bank's arrest of Banga Borat, garnishee proceedings against MLOs, and writ of seizure and sale for other vessels in HRC's fleet; attending at Rajah & Tann's offices for execution of affidavits; reviewing NCCB's arrest papers for Banga Borat; discussing and considering matters with Simon Davidson; email reports to Sea Consortium and RaetsAsia; email correspondence with SeaCon re garnishee proceedings; Email from Jeffrey Lim re settlement agreement with Hanjin to support claim against HRC, reviewing and amending draft, email response to Jeffrey Lim; Email from Watson Farley & Williams; reviewing bills and narratives, comparing costs schedules, drafting schedules of further claims for additional cost and expense.	5.5

Total: 1174

SUMMARY				
		Hours Charged	Hourly Rate	Total
Partner	Simon Davidson	12.1	S\$775	S\$ 9,377.50
Assistant Solicitor	Dirk Janssen	102.7	S\$600	S\$61,620.00
Assistant Solicitor	Michael Buisset	2.6	S\$500	S\$ 1,300.00
Total :				<u>US72,297.50</u>

HFWSP\102677-1

Sea Consortium Pte Ltd
11 Duxton Hill
Singapore 089595

Attention: Messrs Tim Hartnoll/Tristan Howitt

9 Church Street
#19-03
Singapore 049483

Tel +65 6534 0195
Fax +65 6534 5864

holmans@hfw.com.sg
www.hfw.com

TAX INVOICE
GST REG NO: M9-0005261-C

Date: 27 September 2007
Our Ref: SSD/10656/22/iy
Bill No.: S08220

JAAMI
Period Covered : 31 August to 26 September 2007

To our professional charges for all advice and assistance given in this matter as set out in the attached breakdown of time spent.

Our fees :	S\$ 43,900.00
+7% GST	S\$ 3,073.00
Disbursements:	
Courier, telephone, photocopying charges, and other incidentals	S\$ 593.88
+7% GST	S\$ 41.58
Total	<u>S\$ 47,608.46</u>

Hol Fw, Wd

HOLMAN FENWICK & WILLAN
HFWSP\106346-1

Direct remittance may be made to The Hong Kong and Shanghai Banking Co. Ltd.
Collyer Quay Branch, 21 Collyer Quay, Singapore 049320, quoting our bill no.
GB Pounds A/C 260-258843-181 Swift Code: HSBCSGSG
Singapore Dollars A/C 141-364083-002 Swift Code: HSBCSGSG
US Dollars A/C 260-258843-180 Swift Code: HSBCSGSG
If paying by cheque, please return the attached copy with your payment.
Please pay net of all bank charges.